

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 95-115

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In the Matter of

Amendment of the Commission's
Rules and Policies to Increase
Subscribership and Usage of the
Public Switched Network

INITIAL COMMENTS OF THE
NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS

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Public Switched Network

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Pursuant to Sections 1.49, 1.415, and 1.419 of the Federal Communications Commission's ("FCC" or "Commission") Rules of Practice and Procedure, 47 C.F.R. Sections 1.49, 1.415, & 1.419 (1994), the National Association of Regulatory Utility Commissioners ("NARUC") respectfully submits the following initial comments addressing the July 20, 1995 released "Notice of Proposed Rulemaking" ("NPRM") adopted July 13, 1995 1995 in the above captioned proceeding [FCC 95-281] and noticed at 60 Federal Register 44296 on August 25, 1995.

Specifically, while NARUC generally supports the FCC's examination of policies to promote telephone subscribership, we respectfully suggest that (i) the FCC should adopt a collaborative approach to addressing the NPRM issues in a manner that is consistent with existing State initiatives and does not hamper State implementation of universal service policies tailored to local conditions and (ii) proposals to modify the Lifeline/Linkup programs should be addressed through a Federal-State Joint Board.

Finally, because of the possibility, raised by the NPRM, of profound, though perhaps unintended, impacts on existing State regulatory initiatives, NARUC respectfully suggests that both sound public policy and the Administrative Procedure Act indicate that, if the FCC decides to adopt rules for issues on which specific rules were not proposed, the FCC should issue those rules via a further proposed rulemaking to provide an opportunity for additional comment.

In support of its comments, NARUC states as follows:

I. NARUC'S INTEREST

NARUC is a quasi-governmental nonprofit organization founded in 1889. Members include the governmental bodies engaged in the regulation of carriers and utilities from all fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands. NARUC's mission is to improve the quality and effectiveness of public utility regulation in America. More specifically, NARUC is composed of, inter alia, State and territorial officials charged with regulating telecommunications common carriers within their respective borders. In that capacity, they must assure that those telecommunications services and facilities required by the public convenience and necessity are established, and that service is provided at rates that are just and reasonable.

The FCC's NPRM targets new ways to advance subscribership penetration in the United States. Some of these proposals address, and indeed are modeled on, regulatory strictures historically handled at the State level.

In addition, the FCC has suggested that changes to the existing Lifeline and Linkup plans might be in order. Any one of the suggested changes could well have dramatic impacts on both current and pending State initiatives involving universal service and disconnection policy. Accordingly, NARUC has a strong and undeniable interest in all aspects of this proceeding.

II. BACKGROUND

On July 20, 1995, on the eve of NARUC's summer meetings in San Francisco, California, the FCC released the text of the NPRM adopted in this proceeding on July 13, 1995.

The FCC's NPRM is intended to address recent declines in telephone subscribership through a number of proposals that could well directly impact existing and pending State initiatives. For example, the FCC has asked for comment on whether (i) Local Exchange Carrier ("LEC") deposit policies should take into account the diminished credit risk involved when new or reconnected customers agree to voluntary toll reductions; (ii) LECs should be required to offer interstate long-distance blocking services at reasonable rates; (iii) any common carrier should be prohibited from interrupting or disconnecting local exchange service for failure to pay interstate long distance charges; and (iv) the Lifeline and Link-Up Programs should be expanded to provide additional assistance with connection charges and deposits to subscribers taking long distance blocking options.

Although an extensive analysis of the FCC proposal was not possible due to the time constraints imposed by our meeting dates, NARUC did pass a "Resolution on FCC Rulemaking On Telephone Subscribership" on July 26, 1995. The complete text of that resolution is attached as Appendix A.

III. DISCUSSION

- A. The FCC should adopt a collaborative approach to investigating the NPRM issues as (i) all could impact local universal service policies and rates and (ii) many are already the subject of existing or proposed State regulatory initiatives. In addition, NARUC believes that any action the FCC takes in this docket "should be consistent with existing state policies and initiatives" and, in any case, must not limit the flexibility of the states to implement their own universal service policies.

The States' interest in the issues raised in the NPRM, and the potential for significant impacts on both existing and pending State regulatory initiatives is obvious.

Indeed, the NPRM implicitly acknowledges the clear State interest by expressing its own "particular" interest "...in the experience of States that have implemented measures to help increase subscribership." NPRM, ¶ 12, mimeo at 6.

As the tables attached in Appendix B,¹ and the NPRM favorable discussion of existing State-approved LEC disconnection procedures at ¶ 11, mimeo at 5, demonstrate, all fifty States have an existing regulatory structure targeting disconnection policy and related subscribership issues. It is apparent that, at a minimum, these policies could be affected by the FCC's action.

Moreover, as a result of the increasing convergence of competitive forces on the provision of local service, many States are re-examining their existing universal service regimes.² At this critical juncture in the evolution of policies addressing emerging local competition issues, the FCC has initiated this inquiry. As noted in our July 1995 Resolution, NARUC generally supports an effort to increase subscribership. At the same time, however, it is clear that whatever the FCC determines is appropriate as a result of this proceeding, could impact more than just existing State disconnection policies.

¹ Appendix B which has the following eight tables from NARUC's most recent "Utility Regulatory Policy in the United States and Canada": Table 121- LEC Customer Deposit Requirements, Return of Deposits; Table 122- LEC Other Customer Deposits, Reconnection Charges; Table 125- LEC Disconnection Notice; Table 126- LEC Residential Disconnection for Non-local Exchange; Table 139- Reduced Telephone Rates for Non-profit Organizations; Table 140- State Participation - Low Income Assistance Programs; Table 147- Universal Service for Communications; Table 154- Telecommunications Network Modernization Activities. These tables generally provide the broad contours of certain aspects of existing State programs.

² See, note 1, supra, re: NARUC's last published tally of pending proceedings addressing universal service issues. At last count, at least thirty-five states now, either by legislative fiat or State Commission policy, have determined that competition in the provision of local switched services is permissible.

Because of the interplay between universal service policy and regulatory paradigm shifts required by emerging competition, any FCC action could impact both state universal service policies and local rates.

The preservation and advancement of universal service is of critical importance to both federal and state regulators. At least since the early '80s, the FCC has acknowledged the States' strong interest and historical role in assuring universal service goals are met.³ Elsewhere in the NPRM, ¶ 48, mimeo at 18, the FCC also acknowledges that State and local governments "...understand the needs of their local communities." NARUC agrees.

In light of that specialized State expertise, and because of the obvious joint Federal and State interest in the universal service issues raised by the NPRM, the FCC should use a more collaborative federal-state process to address the issues raised in this proceeding.

For example, the NPRM does not address the range of other factors that underlie, or options to address, low or declining levels of subscribership in some states, populations, or service territories.

³ See, e.g., the FCC's order adopting the recommendation of the CC Docket 80-286 Federal-State Joint Board to establish the Lifeline assistance program, 51 Federal Register 1371 (1/13/86), and the "Link-Up" program. *In the Matter of MTS/WATS Market Structure and Amendment of Part 67 of the Commission's Rules*, 2 FCC Rcd 2953 (1987). Cf. Decision and Order, *In the Matter of Amendment of Part 67 of the Commission's Rules and Establishment of a Joint Board*, CC Docket No. 80-286, Released 2/15/84. See also Second Recommended Decision and Order, released by the Joint Board 9/26/83, 48 Fed. Reg. 46556 (10/13/83).

The NPRM also does not explicitly focus on the possible impacts on existing and evolving State regulatory initiatives and the concomitant need to assure that the Federal actions are "consistent with" those efforts and do not limit the flexibility of the States to implement universal service policies. State expertise and resources concerning such matters are critical to an appropriate resolution of the issues raised in this proceeding.

B. At a minimum, proposals to modify the existing Lifeline and Linkup programs should be addressed through a Joint Board.

The FCC's proposal in this docket mirrors its earlier July 2, 1986 released "Further Notice of Proposed Rulemaking" ("FNPRM") *In the Matter of MTS and WATS Market Structure; Amendment of Part 67 of the Commission's Rules and Establishment of a Joint Board*, CC Docket No. 78-72, CC Docket No. 80-286, 1986 FCC LEXIS 3115 (1986). In ¶ 16 of that 1986 FNPRM, the FCC noted its interest

"in assessing whether the lifeline program and high cost assistance measures presently in place reflect a properly targeted response to the need for assistance to low income subscribers and subscribers in high cost areas. To aid in our analysis...parties should address whether existing lifeline measures, through the federal program or individual state plans, have been effective in promoting telephone subscribership."

In ¶ 21 of that FNPRM, the FCC requested that

"...the Joint Board evaluate all of the issues discussed in this...Notice.. and prepare recommendations for our consideration concerning further steps that may be warranted to further the goals described.."

NARUC respectfully suggests that a similar approach is warranted here. Given (a) the extensive State participation in the Federal lifeline and linkup programs, (b) the potential peripheral

and direct impacts of any final action in this proceeding, and (c) the acknowledged role and expertise the States have in these matters, the FCC should refer these issues to a Federal State joint board for a recommendation.

Moreover, at a minimum, a referral of those issues directly implicating the Federal Lifeline and Link-Up programs is particularly appropriate given the Joint Board's role in prior proceedings structuring those initiatives. Indeed, as this docket can be considered an extension of the prior Joint Board proceedings addressing these two programs, Section 410(c) indicates that the FCC must "...afford the State members of the Joint Board an opportunity to participate in its deliberations...when it has under consideration ...any further decisional action that may be required.." 47 U.S.C. § 410(c).

C. Should the FCC decide to adopt rules for issues on which specific rules have not been proposed in the NPRM, it should issue a Further Notice of Proposed Rulemaking to provide a further opportunity for comment.

The Administrative Procedure Act ("APA"), 5 U.S.C. § 553(b), requires the FCC to provide notice of a proposed rulemaking "adequate to afford interested parties a reasonable opportunity to participate in the rulemaking process."⁴

⁴ Florida Power & Light Co. v. U.S., 269 U.S. App. D.C. 377, 846 F.2d 765, 771 (D.C. Cir. 1988); see also *Senate Judiciary Committee, Administrative Procedure Act*, S. Rep. No. 752, 77th Cong., 1st Sess. 14 (1945) ("Agency notice must be sufficient to fairly apprise interested parties of the issues involved, so that they may present responsive data or argument relating thereto").

This requirement serves both (1) "to reintroduce public participation and fairness to affected parties after governmental authority has been delegated to unrepresentative agencies"; and (2) to assure that the "agency will have before it the facts and information relevant to a particular administrative problem." National Association of Home Health Agencies v. Schweiker, 223 U.S. App. D.C. 209, 690 F.2d 932, 949 (D.C. Cir. 1982).

As discussed, supra, Federal policy initiatives in this area include a significant risk of profoundly, though perhaps unintentionally, impacting existing State regulatory policies and initiatives.

In light of that potential, NARUC respectfully suggests that both sound public policy and the requirements of the APA indicate that, should the FCC decide to adopt rules for issues on which specific rules have not been proposed in the NPRM, it should issue a Further Notice of Proposed Rulemaking to provide a further opportunity for comment.

IV. CONCLUSION

For the foregoing reasons, NARUC respectfully requests that the FCC (i) refer proposals to modify the Lifeline/Linkup programs to a Federal-State Joint Board, (ii) assure that FCC actions in this docket do not impede state implementation of universal service policies tailored to local conditions or disrupt existing state subscribership regulatory paradigms, and finally, (iii) issue a further NPRM if it decides to adopt rules on issues for which specific rules were not proposed.

Respectfully submitted,



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CC Docket No. 95-115

APPENDIX A

NARUC'S JULY 26, 1995 RESOLUTION

RESOLUTION ON FCC RULEMAKING
ON TELEPHONE SUBSCRIBERSHIP

**Resolution on FCC Rulemaking
On Telephone Subscribership**

WHEREAS, On July 20, 1995, the FCC released a Notice of Proposed Rulemaking (NPRM) in CC Docket 95-115 to address recent declines in telephone subscribership; and

WHEREAS, Among the issues on which the FCC seeks comments:

- o requiring that LEC deposit policies take into account the diminished credit risk involved when new or reconnected customers agree to voluntary toll reductions;
- o requiring that LECs offer interstate long-distance blocking services at reasonable rates;
- o prohibiting any common carrier from interrupting or disconnecting local exchange service for failure to pay interstate long distance charges;
- o expanding the Lifeline and Link-Up Programs to provide additional assistance with connection charges and deposits to subscribers taking long distance blocking options; and

WHEREAS, The preservation and advancement of universal service is of critical importance to both federal and state regulators; and

WHEREAS, Several states already have implemented or are investigating policies similar to those proposed in this proceeding; and

WHEREAS, FCC rules adopted as a result of this proceeding could impact state universal service policies and local rates; and

WHEREAS, Proposals to modify the existing Lifeline and Link-Up programs may require the participation of a Federal-State Joint Board; and

WHEREAS, The NPRM does not address the range of other factors that underlie, or options to address, low or declining levels of subscribership in some states, populations, or service territories; and

WHEREAS, Universal service issues are best addressed through a collaborative federal-state process, rather than by a process in which state input is limited to the filing of written comments; now, therefore, be it

RESOLVED, That the Executive Committee of the National Association of Regulatory Utility Commissioners (NARUC), convened in its Summer Meeting in San Francisco, California supports the FCC's examination of policies to promote telephone subscribership; and be it further

RESOLVED, That proposals raised to modify the existing Lifeline and Linkup programs in the NPRM should be addressed through a Federal-State Joint Board; and be it further

RESOLVED, That other issues and solutions relating to telephone subscribership are being addressed by state commissions in a variety of innovative ways and federal action should be consistent with existing state policies and initiatives and limited to situations where clear federal policies would otherwise be frustrated; and be it further

RESOLVED, That FCC rules to increase telephone subscribership must not limit the flexibility of the states to implement their own universal service policies; and be it further

RESOLVED, That should the FCC decide to adopt rules for issues on which specific rules have not been proposed in the NPRM, it should issue a Further Notice of Proposed Rulemaking to provide a further opportunity for comment; and be it further

RESOLVED, That the NARUC General Counsel file comments in the FCC's proceeding consistent with the positions put forth in this resolution.

Sponsored by the Committee on Communications
Adopted July 26, 1995

In the Matter of
Amendment of the
Commission's Rules and Policies
to Increase Subscribership and Usage of the
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CC Docket No. 95-115

APPENDIX B

EXCERPTS FROM

NARUC'S COMPILATION OF UTILITY REGULATORY POLICY
1994-1995

TABLE 121 - LEC CUSTOMER DEPOSIT REQUIREMENTS, RETURN OF DEPOSITS
TABLE 122 - LEC OTHER CUSTOMER DEPOSITS, RECONNECTION CHARGES
TABLE 125 - LEC DISCONNECTION NOTICE
TABLE 126 - LEC RESIDENTIAL DISCONNECTION FOR NON-LOCAL EXCHANGE
TABLE 139 - REDUCED TELEPHONE RATES FOR NON-PROFIT ORGANIZATIONS
TABLE 140 - STATE PARTICIPATION - LOW INCOME ASSISTANCE PROGRAMS
TABLE 147 - UNIVERSAL SERVICE FOR COMMUNICATIONS
TABLE 154 - TELECOMMUNICATIONS NETWORK MODERNIZATION ACTIVITIES

TABLE 121 - CUSTOMER DEPOSIT REQUIREMENTS, RETURN OF DEPOSITS - LOCAL EXCHANGE TELEPHONE COMPANIES

AGENCY	6 Under what circumstances may a deposit be required? SEE KEY BELOW		7 What is the interest rate earned by deposits		8 When are deposits returned to customers SEE KEY BELOW	
	Residential	Business	Residence	Business	Residential	Business
ALABAMA PSC	A	A	7%	7%	3	3
ALASKA PUC	A, B, C, E, F	A, B, C, E, F	statutory	statutory	3	3
ARIZONA CC	A, B, C	A, B, C	6%	6%	2	2 with review
ARKANSAS PSC	A, B, C, D	A, B, C, D	statutory	statutory	2, 5	5
CALIFORNIA PUC	A, E, F, unpaid final bill		7%	7%	2	2
COLORADO PUC	A, B, C	A, B, C, Toll Use	T-Bill Rate		2	2
CONNECTICUT DPUC	A, B, C	A, B, C	6%	6%	2	2
DELAWARE PSC	A, B, C	A, B, C	9%	9%	2	3
DC PSC	B, C, E	A, B, C, E	5.73%	5.73%	2	
FLORIDA PSC	A, B, C, D, E	A, B, C, D, E	6%	6-7%	23 mos sat. pmts	23 mos sat. pmts/ life of account
GEORGIA PSC	A, B, C, E	A, B, C, E	7%	7%	2	2
HAWAII PUC	A, B, C, E	A, B, C, E	12%	12%	2, 5	2, 5
IDAH0 PUC	B, C, D, E	A, B, C, D, E, F	T-Bill Rate		2, 5	2, 5
ILLINOIS CC	B, C, D, E, F	B, C, D, E, F	T-Bill Rate		2	2
INDIANA URC	A, B, E, F		6%		1	
IOWA UB	A, C	A, C	7.5%	7.5%	2	2
KANSAS SCC	B, C, D, E, F	B, C, D, E, F	money market-based		2	Telco discretion
KENTUCKY PSC	Telco discretion	Telco discretion	6%	6%	2	2
LOUISIANA PSC	A, D, E, F	A, D, E, F	5%	5%	4, 5	4, 5
MAINE PUC	D, E	A	varies	varies	2	4
MARYLAND PSC	A, B, C, E	A, B, C, E	Statutory	Statutory	2, 5	4, 5
MASSACHUSETTS DPUC	E, F	A, B, C, E	6%	varies	6 months	4 - 6 mos.
MICHIGAN PSC	D, E, F, owes any utility		9%	9%	1	
MINNESOTA PUC	B, C	B, C	6%	6%	2	2
MISSISSIPPI PSC	A, B, C	A, B, C	8%	8%	2	2
MISSOURI PSC	A, B, C, D, E, F	A, B, C, D, E, F	7-9%	7-9%	2, 4, 5	2, 4, 5
MONTANA PSC	B, C, D, E, F	B, C	12%	12%	2, 5	2, 5
NEBRASKA PSC	A, C, D, E, F	A, C, D, E, F	7%	7%	2	36 mos sat. pmts
NEVADA PSC	A, B, C	A, B, C	4.39%	4.39%	2	2
NEW HAMPSHIRE PUC	C, E, F, short term service	A, C, short term service	Prime 1/	Prime 1/	2	36 mos sat. pmts
NEW JERSEY BPU	Telco discretion	Telco discretion	6%	6%	1, 2	1, 3
NEW MEXICO SCC	A, B, C, D, E, F	A, B, C, D, E, F	Tariffed	Tariffed	2	2
NEW YORK PSC	E, F	A, B, C, E, F	3.70%	3.70%	2	36 mos sat. pmts
NORTH CAROLINA UC	A, B, C, E, F 3/	A, B, C, E, F 3/	8%	8%	2	2
NORTH DAKOTA PSC	A, B, C, E, F	A, B, C, E, F	5%	5%	1, 2	2
OHIO PUC	B, C	B, C	5% min.	5% min.	2	2
OKLAHOMA CC	A, B, C	C	T-Bill rate		2	5
OREGON PUC	C, D, E	A, C, E (Tariff)	6%	6%	2	per tariff
PENNSYLVANIA PUC	B, C, E, F	A, B, C, D, E, F	9%	varies	2	Varies
RHODE ISLAND PUC	E, F		12%	12%	6 months	
SOUTH CAROLINA	A, B, C, E, F	A, B, C, E, F	8%	8%	3, 4, 5	3, 4, 5
SOUTH DAKOTA PUC	B, C	B, C	7%	7%	2	2
TENNESSEE PSC	B, C, E, F	B, C	Varies	Varies	2	2
TEXAS PUC	B, C	B, C	6%	6%	2, 5	3, 5
UTAH PSC	A, B, C, D, E, F	A, B, C, D, E, F	Varies	Varies	2, 5	2, 5
VERMONT PSB						
VIRGINIA SCC	A, B, C	A, B, C	Varies	Varies	2	3
WASHINGTON UTC	C, E	A, B, C, E	3.5%	3.5%	2	2
WEST VIRGINIA PSC	A, B, C, E	A, B, C, E	8%	8%	1	3
WISCONSIN PSC	D, E	B, C	6.9%	6.9%	12 mos no disconn.	3
WYOMING PSC	B, can't verify income, C, E		6%	6%	2, 5	2, 5
VIRGIN ISLANDS	A	A	5%	5%	2	2
CRTC	C, abnormal risk	C, abnormal risk	Bank rate	Bank rate	2 - applied	2 - applied

A=New customer
B=No Credit Established
C=Poor Credit History
D=Fraud or theft of service
E=Disconnected for non-payment
F=Delinquent

1=After 9 months of satisfactory pmts.
2=After 12 months of satisfactory pmts.
3=After 24 months of satisfactory pmts.
4=When company deems credit has been established-no set time period.
5=Customer termination of service.
6=Upon customer request.

1/ After six months.

3/ Rules provide several options to establish service, including security deposit.

TABLE 122 - ADDITIONAL CUSTOMER DEPOSITS, RECONNECTION CHARGES - LOCAL EXCHANGE TELEPHONE COMPANIES

AGENCY	9a		9b		10	
	AFTER A CUSTOMER HAS BEEN DISCONNECTED FOR NON-PAYMENT, IN ORDER TO BE RECONNECTED THERE IS:				WHAT AUTHORITY GOVERNS DEPOSITS? S, CR, T, P SEE BELOW	UNIFORM PRACTICES FOR ALL TELCOS FOR DEPOSITS?
	An additional Deposit Required		A Reconnection Charge			
	Residential	Business	Residential	Business		
ALABAMA PSC	Credit risk	Yes	Yes	Yes	CR	YES
ALASKA PUC	At telco discretion		Yes	Yes	S, CR, T	Y, 3AAC 48.420
ARIZONA CC	If current deposit deficient		\$0-50.50	\$0-73.50	T supersedes CR	
ARKANSAS PSC	Yes	Yes	Yes	Yes	S, CR	NO
CALIFORNIA PUC	If current deposit deficient		Yes	Yes	T	NO
COLORADO PUC	If current deposit deficient		Treated as new application		CR, T	NO
CONNECTICUT DPUC	At telco discretion	2/	Yes	Yes	S, CR, T	YES
DELAWARE PSC	No	No	Yes	Yes	T	One LEC
DC PSC	Yes	Yes	Yes	Yes	CR, T	One LEC
FLORIDA PSC	At telco discretion		Yes	Yes	CR	YES
GEORGIA PSC	If current deposit deficient		Yes	Yes	CR	YES
HAWAII PUC	If additional deposit necessary		Yes	Yes	CR, T	One LEC
IDAHO PUC	If current deposit deficient		Yes	Yes	CR, T	YES
ILLINOIS CC	If current deposit deficient		Yes	Yes	CR	YES
INDIANA URC	Sometimes		Yes	Yes	CR	NO
IOWA UB	At telco discretion		Yes	Yes	S, CR, T	≤2 MOS. BILL
KANSAS SCC	No	No	Yes	Yes	CR, T	YES
KENTUCKY PSC	If current deposit deficient		Yes	Yes	S, T	YES
LOUISIANA PSC	If current deposit deficient		Yes	Yes	CR, T, P	NO
MAINE PUC	At telco discretion		Yes	Yes	S, CR	NO
MARYLAND PSC	At telco discretion		\$13	\$16	CR, T	
MASSACHUSETTS DPU	If current deposit deficient		\$19.40	\$23.19	CR, T	YES
MICHIGAN PSC	At telco discretion		Varies		S, CR, T, P	YES
MINNESOTA PUC	At telco discretion		Yes	Yes	S, CR, T	NO
MISSISSIPPI PSC	If current deposit deficient		Yes	Yes	CR, T	YES
MISSOURI PSC	Possibly	Possibly	Yes	Yes	CR, T	YES
MONTANA PSC	Usually	Usually	\$20	\$28.50	CR, T	YES
NEBRASKA PSC	Usually	Usually	Yes	Yes	CR	YES
NEVADA PSC	Yes	Yes	Yes	Yes	S, CR	
NEW HAMPSHIRE PUC	No	No	Yes	Yes	CR	YES-PUC 403.04
NEW JERSEY BPU	At telco discretion		Yes	Yes	CR, T, Admin. Code	YES
NEW MEXICO SCC	Usually	Usually	Yes	Yes	T, P	NO
NEW YORK PSC	At telco discretion		Yes	Yes	S, CR, T	NO
NORTH CAROLINA UC	At telco discretion		Yes	Yes	CR	YES
NORTH DAKOTA PSC	At telco discretion		Yes	Yes	CR, T	
OHIO PUC	Yes	Yes	Yes	Yes	S, CR, T	YES
OKLAHOMA CC	No	No	Yes	Yes	CR, T	YES
OREGON PUC	If no deposit or if deficient	Varies	Yes	Yes	CR (Res.); T (Bus.)	YES
PENNSYLVANIA PUC	No	Varies	Yes	Varies	CR, T	YES-RESIDENCE
RHODE ISLAND PUC						
SOUTH CAROLINA PSC	Yes	Yes	Yes	Yes	CR, T	
SOUTH DAKOTA PUC	At telco discretion		\$15	\$15	CR	NO
TENNESSEE PSC	If current deposit deficient		Yes	Yes	CR, T	NO
TEXAS PUC	If usage has doubled, deposit is not to exceed 1/6 est. ann. bill		Varies	Varies	S, CR, T	
UTAH PSC	Yes	Yes	Yes	Yes	CR, T	NO
VERMONT PSB						
VIRGINIA SCC	If current deposit deficient		Yes	Yes	CR, T	YES
WASHINGTON UTC	At telco discretion		Yes	Yes	CR	YES
WEST VIRGINIA PSC	Yes	Yes	Yes	Yes	S, CR, T	
WISCONSIN PSC	1/ At telco discretion		Yes	Yes	CR	YES
WYOMING PSC	If current deposit deficient		Yes	Yes	CR, T	YES
CRTC	Yes	Yes	Yes	Yes	T	
VIRGIN ISLANDS PSC	Yes	Yes	Yes	Yes	CR, T	ONE TELCO

- 1/ Disconnection happens in two phases: after suspension (line is disabled) a deposit may be required and there is a reconnection fee (average \$11.50); after permanent disconnection, customer must apply as a new customer with all applicable installation and deposit charges.
- 2/ Maximum security deposit is 3/12 of annual bill.

S=Statute
CR=Commission Rule/
Order/Policy
T=Tariff Provision
P=Company Policy

TABLE 125 - DISCONNECTION NOTICE - LOCAL EXCHANGE TELEPHONE COMPANIES

17		17a	17b	17c	17d
AGENCY	NOTICE GIVEN TO RESIDENTIAL CUSTOMER OF INTENT TO DISCONNECT	SPECIAL DISCONNECTION ARRANGEMENTS FOR SPECIAL CLASSES OF CUSTOMERS			
		Low-Income	Medical Emergency	Elderly	Other
ALABAMA PSC	Minimum 5 days written	Disconnection postponed when life or health threatened			
ALASKA PUC	Written	None	None	None	None
ARIZONA CC	5 days written notice	None	None	None	None
ARKANSAS PSC	Shut-off notice, 5 days written	None	Rule 8(c) personal contact, 3rd party delay for medical emergency.	notice, 30-day	
CALIFORNIA PUC	5-7 days written notice	None	None	None	None
COLORADO PUC	7 days written notice	None	None	None	None
CONNECTICUT	13 days, inform of rights	None	Postponed with Dr. certificate	None	3rd party notice
DELAWARE PSC	10 days written notice	None	None	None	None
DC PSC	Written or verbal notice	Any customer may request 3rd party notification			
FLORIDA PSC	5 working days-written	None	None	None	None
GEORGIA PSC	5 days written notice	None	Postpone 30 days	None	None
HAWAII PUC	7 days written notice	None	None	None	None
IDAHO PSC	7 days written, 24 hrs verbal	Disconnect notice must inform of customers rights-pmt arrangements, protest to PUC, postpone for medical emergency			
ILLINOIS CC	Written notice, phone call	None	None	None	None
INDIANA URC	5 days written notice	None	None	None	None
IOWA UB	5 days written notice	None	Postponement	None	None
KANSAS SCC	7 days written notice	None	Postponement	None	None
KENTUCKY PSC	10 days written	LEC must notify all customers of assistance programs			
LOUISIANA PSC	5 days written notice	None	None	None	None
MAINE PUC	14 days	None	Yes	None	None
MARYLAND PSC	5 days notice for non-pmt	None	None	None	None
MASSACHUSETTS DPU	15 days written, 2 days verbal	Customer protection notice has info on right to dispute; no disconnect during serious illness/personal emergency; protection for the elderly. Customer records are noted with special needs			
MICHIGAN PSC	10 days	None	None	None	None
MINNESOTA PUC	5 days notice	None	None	None	None
MISSISSIPPI	5 days notice	None	None	None	None
MISSOURI PSC	5 days written, 24 hrs verbal	None	Postponed 21 D	None	None
MONTANA PSC	7 days written, 24 hrs verbal	Any customer may request 3rd party notice			
NEBRASKA PSC	written notice	None	None	None	None
NEVADA PSC	Minimum 5 days written	None	Postponed w/Dr. certificate (max60 D)	None	None
NEW HAMPSHIRE PUC	Minimum 12 days notice	None	Postponed 30 days w/Dr. certificate	None	None
NEW JERSEY BPU	Written-3 LECs, & verbal-2	2 LECs-none; 1 LEC allows 3rd party notification			
NEW MEXICO SCC	7 days	None	None	None	None
NEW YORK PSC	8 days - outgoing calls; 20 days - incoming & outgoing	Deferred pmt plan available	Postponed w/30-day renewable Dr.'s Certificate	Postponed w/20-	3rd party notice
NORTH CAROLINA	5 days written	None	None	None	None
NORTH DAKOTA	Written	None	None	None	None
OHIO PUC	Minimum 7 days	Any customer may request 3rd party notification			
OKLAHOMA CC	5 days written, unless tampering found or threat to life/property	None	None	None	None
OREGON PUC	5 days written	None	w/medical certif.	None	None
PENNSYLVANIA PUC	7 days for suspension 10 days for termination		w/medical certif.		
RHODE ISLAND	15 days written, phone call reminder	No disconnect in emergency/illness			
SOUTH CAROLINA	5 days written	None	None	None	None
SOUTH DAKOTA PUC	15 days; explanation of reason	None	None	None	None
TENNESSEE PSC	Written notification	None	3rd Party notice	None	None
TEXAS PUC	10 days written	None	None	None	None
UTAH PSC	Written; verbal contact attempt	None	None	None	None
VERMONT PSB	Written, telephone call attempt	None	None	None	None
VIRGINIA SCC					
WASHINGTON UTC	10 days written, 2 call attempts	Any customer may request 3rd party notification			
WEST VIRGINIA PSC	Personal, telephone, or written	Contact Dept of Welfare		Contact near relative	3rd party notice
WISCONSIN PSC	5 days, reasonable call attempt	Any customer may request notification of Dept. of Health and Social Services; deferred payment plans available; utilities are to recognize extenuating circumstances.			
WYOMING PSC	7-30 days, written	3rd party notice	medical certif.	3rd party notice	3rd party notice
CRTC	Min. 24 hrs written/verbal	None	None	None	None
VIRGIN ISLANDS	Written, telephone attempt	None	None	None	None

**TABLE 126 - RESIDENTIAL DISCONNECTION FOR NON-LOCAL EXCHANGE CHARGES
LOCAL EXCHANGE TELEPHONE COMPANIES**

AGENCY		MAY RESIDENTIAL BASIC LOCAL EXCHANGE SERVICE BE DISCONNECTED FOR NON-PAYMENT OF THESE NON-LOCAL EXCHANGE CHARGES FOR WHICH THE LEC PROVIDES BILLING AND COLLECTION SERVICES?												
		INTER-EXCHANGE			18a		* INTRASTATE		INTER- **		18b		18c	18d
		LONG-DISTANCE TOLL CHARGES	LEC Can Impose Blocking	With Restriction	DIAL-IT CHARGES		STATE DIAL-IT (900) CHARGES	LEC Can Impose Blocking	LEC Has Blocking on Request	AOS/OSP Reseller Charges	Other			
					976	900								
ALABAMA PSC		Yes	No	Optional	No-CR	No-CR	No	Yes 7/	976/900	No	Yes			
ALASKA PUC	5/	Yes	Yes	No	No	No	No	Yes 7/	976/900	No	Yes			
ARIZONA CC	1/	Yes	No		No-CR	No-CR	No	Yes 7/	976/900	No	No			
ARKANSAS PSC		Yes	No	Optional	N/A	No-T	No	One LEC	900	No	No			
CALIFORNIA PUC	1/	Yes	No	Yes	No-CR	No-CR	No	Yes	976/900	Yes	No 1/			
COLORADO PUC		No	Yes		No-CR	No-CR	No	Yes 7/	976/900	No	No			
CONNECTICUT DPUC		Yes	Yes	Yes	No-LEC	No-LEC	No	No	900 6/	No	No			
DELAWARE PSC		No	Yes	Yes	N/A	No-CR	No	Yes	900 6/	No	No			
DC PSC	2/	Yes	No		No-CR	N/A	No	Yes	976	Yes	Yes 2/			
FLORIDA PSC	1/	Yes	No		No-CR	No-CR	No	Yes 7/	976/900	No	No			
GEORGIA PSC		Yes	Yes	No	No-CR	No-CR	No	Yes	976/900	No	No			
HAWAII PUC		No	No		No	No	No	Yes	900 6/	No	No			
IDAHO PUC	3/	No	Yes	No	No-CR	No-CR	No	Yes	976/900	No	No			
ILLINOIS CC		Yes	No		No-LEC	No-LEC	No	No	976/900	Yes	No			
INDIANA URC		Yes	Under review		No	No-LEC	No	No	976/900	Yes	No			
IOWA UB	1/	Yes	Some 4/	No rule	No-S	No-S	No	Yes	976/900	No	No			
KANSAS SCC		Yes	Yes		No-CR	No-CR	No	Yes-Toll	976/900	No	Yes			
KENTUCKY PSC	1/	Yes	No		No-CR	No-CR	No	No	976/900	No	No			
LOUISIANA PSC		Yes	No		No-CR	No-CR	No	Yes	976/900	Yes	No			
MAINE PUC	1/	Yes	Yes	Optional	No-CR	No-CR	No	Yes	976/900	Yes	Yes			
MARYLAND PSC		Yes	Yes		Yes-LEC	Y-LEC	No	Yes	976/900	Yes	Yes			
MASSACHUSETTS DPU		No	No	Yes	No-CR	No	No	No	976/900	No	No			
MICHIGAN PSC		Some	Yes	No	No-S	No-S	No	Yes 7/	976/900	No				
MINNESOTA PUC		Yes	Yes	Pending	No-CR	No-CR	No	Yes	976/900	No	No			
MISSISSIPPI PSC		Yes	No	No rule	No-LEC	No-LEC	No	No	976/900	No	No			
MISSOURI PSC		Yes	No	No	No-CR	No-CR	No	No	976/900	Yes	Yes			
MONTANA PSC		No	Yes	No	No-CR	No-CR	No	No	976/900	No	No 1/			
NEBRASKA PSC		Yes	Yes	Yes	No-CR	No-CR	No	Yes	976/900	Yes	No			
NEVADA PSC		No	Yes	Fee charged			No	Yes 7/	900 6/	Yes				
NEW HAMPSHIRE PUC		Yes	No	Optional	No-CR	No-CR	No	Yes 7/	976/900	Yes	No			
NEW JERSEY BPU	8/	Y-1/N-2	N-1; Y-2		No-CR	No-CR	No	Y-1; N-2	900 6/	Yes-2	Yes-2			
NEW MEXICO SCC		Yes	Yes 4/		Yes-LEC	Yes-LE	No	Yes	976/900	Yes				
NEW YORK PSC		No	Yes	Optional	No-CR	No-CR	No	Yes	976/900	No	No			
NORTH CAROLINA UC		Yes	No		No-T	No-CR	No	Yes	976/900	No	No			
NORTH DAKOTA PSC	10/	Yes	Yes	Yes	No-CR	No-CR	No	Yes 7/	976/900	Yes				
OHIO PUC		Yes	Yes		No-CR	N/A	No	Yes	976/900	Yes	No			
OKLAHOMA CC		Yes	Yes	Yes	N/A	No-LEC	No	Yes	900	Yes	No			
OREGON PUC		Yes	Yes		No-CR	No-CR	No	Yes 7/	976/900	No				
PENNSYLVANIA PUC		No	Yes	Yes	No-CR	N/A	No	Yes	976/900	No	No			
RHODE ISLAND PUC		Yes			N/A	N/A	No	No	976/900					
SOUTH CAROLINA PSC		Yes	Yes	No	No	No	No	Yes	976/900	Yes	Yes			
SOUTH DAKOTA PUC		Yes	Yes	Yes	No-CR	N/A	No	Yes 7/	976/900	Yes				
TENNESSEE PSC		Yes	No	Optional	N/A	No-CR	No	No	976/900	Yes	Yes			
TEXAS PUC		Yes	Yes	Yes	No-CR	No-CR	No	Yes	976/900	Yes				
UTAH PSC		Yes	No	Fee charged	No-LEC	No-LEC	No	Yes	976/900	No	Yes			
VERMONT PSB	9/	Yes					No							
VIRGINIA SCC		Yes	Yes	No	N/A	No-CR	No	Yes	900	No	No			
WASHINGTON UTC		Yes	Yes	Yes	No-CR	No-CR	No	No	976/900	No	No			
WEST VIRGINIA PSC	1/	Yes	Yes	Tariff	N/A	No-CR	No	Yes 7/	976/900	Yes	1/			
WISCONSIN PSC		Yes	Yes		No-S	No-S	No	Yes	976/900	Yes	No			
WYOMING PSC		No	Some 4/	Yes	N/A	No-CR	No	Yes	900	No				
CRTC		Some	Yes	Yes	No-CR	No-CR	Yes	Yes	No	N/A				
VIRGIN ISLANDS PSC		Yes	Yes	No	Yes	Yes		Yes		N/A				

* See also Table 101.

** In September 1991, the FCC adopted rules for Interstate 900, including a prohibition on disconnection of basic local exchange and long-distance service for failure to pay interstate 900 charges as well as requiring LECs to offer blocking to residential subscribers free of charge for a first request.

FOOTNOTES - TABLE 126

- 1/ Local exchange service (regulated) may be disconnected for non-payment of regulated charges; for non-regulated charges, LEC may use collection agency or civil procedures, but may not disconnect or threaten to disconnect.
- 2/ LEC can disconnect for non-payment of unregulated service charges, such as for directory advertising or wire maintenance.
- 3/ Telephone Customer Relations Rules 9/1/90, General Order No. 181, prohibit disconnection of essential service for non-payment of bills for non-essential service.
- 4/ US West tariff in place, "Selective Carrier Denial".
- 5/ All these issues are under consideration.
- 6/ This refers to interstate 900.
- 7/ On subscribers who abuse the service; i.e. those who continue to call and refuse to pay.
- 8/ Toll blocking is available as a service option.
- 9/ But not for a total unpaid balance of less than \$50.
- 10/ Effective 1/1/93.

TABLE 139 - REDUCED TELEPHONE RATES FOR NON-PROFIT ORGANIZATIONS

AGENCY	AGENCY HAS ORDERED OR APPROVED TELCO OFFERING REDUCED TELEPHONE RATES FOR:		
	PREFERENTIAL RATES	TYPE OF ORGANIZATION	RATE STRUCTURE
ALABAMA PSC	YES-SOME TELCOS YES-EFFECTIVE 7/ 1/11/93	RELIGIOUS RURAL PUBLIC SCHOOLS-CLASSROOM COMMUNICATIONS SERVICE (SC BELL TARIFF) HAYNEVILLE TEL TARIFF APPROVED 1995	REDUCED RATE SPECIAL LOW TARIFFED RATE TO PROMOTE DISTANCE LEARNING FOR RURAL SCHOOLS. APPROX. 50% REDUCTION
ALASKA PUC	NO	-	-
ARIZONA CC	NO	-	-
ARKANSAS PSC	NO	-	-
CALIFORNIA PUC	NO	-	-
COLORADO PUC	NO-PROHIBITED BY LAW	-	-
CONNECTICUT DPUC	NO 8/	-	-
DELAWARE PSC	NO	-	-
DC PSC	NO	-	-
FLORIDA PSC	NO	-	-
GEORGIA PSC	NO	-	-
HAWAII PUC	NO	-	-
IDaho PUC	YES - US WEST	CHARITABLE ORGANIZATION/CLERGY	25% OFF ACCESS RATE
ILLINOIS CC	PROHIBITED-STATUTE	-	-
INDIANA URC	NO	-	-
IOWA UB	YES 1/	ELEEMOSYNARY RATES 1/	-
KANSAS SCC	SOUTHWESTERN BELL	PRIVATE/PUBLIC EDUCATION INSTITUTIONS	42% DISCOUNT ON INTERACTIVE VIDEO 9/
KENTUCKY PSC	NO 2/	-	-
LOUISIANA PSC	YES BY STATUTE	CHARITABLE ORG, PUBLIC/PAROCHIAL SCH. CLERGY, CHURCHES	25% OFF REGULAR BUSINESS RATE RESIDENTIAL RATE OR 25% OFF REGULAR RESIDENTIAL RATE
MAINE PUC	NO	-	-
MARYLAND PSC	NO 3/ 8/	-	-
MASSACHUSETTS DPU	NO 4/	-	-
MICHIGAN PSC	NO	-	-
MINNESOTA PUC	YES	SCHOOLS	MUST BE BELOW BUSINESS RATE
MISSISSIPPI PSC	YES	CHARITABLE INSTITUTIONS CLERGY SCHOOLS AND CHURCHES	25% OFF BUSINESS RATE 25% OFF RESIDENCE RATE 15% OFF BUSINESS RATE
MISSOURI PSC	YES 10/	CLERGY	RESIDENCE RATE--CERTAIN CONDITIONS
MONTANA PSC	NO	-	-
NEBRASKA PSC	NO	-	-
NEVADA PSC	NO	-	-
NEW HAMPSHIRE PUC	NO	-	-
NEW JERSEY BPU	YES	CHARITIES FURNISHING DIRECT AID, CLERGY	25% OFF REGULAR BUSINESS RATE
NEW MEXICO SCC	NO	-	-
NEW YORK PSC	NO	-	-
NORTH CAROLINA UC	NO	-	-
NORTH DAKOTA PSC	YES	NON-PROFIT ORGANIZATIONS	MIDWAY BETWEEN BUSINESS AND RESIDENTIAL RATE
OHIO PUC	YES	SCHOOLS AND CHURCHES	RESIDENTIAL RATES
OKLAHOMA CC	NO	-	-
OREGON PUC	NO	-	-
PENNSYLVANIA PUC	NO	-	-
RHODE ISLAND PUC	NO	-	-
SOUTH CAROLINA PSC	YES	CHURCHES, CLERGY PUBLIC SCHOOLS	RESIDENTIAL RATES REDUCED PAYPHONE RATES
SOUTH DAKOTA PSC	YES	-	-
TENNESSEE PSC	YES YES, SC BELL	CHURCHES, CHARITABLE ORGS., CLERGY PUBLIC SCHOOLS, PUBLIC LIBRARIES	25% OFF REGULAR BUSINESS RATES FOR CLASSROOM USE, ONE-LINE ISDN AT RESIDENTIAL RATES (12/93)
TEXAS PUC	YES-1993 LAW, ALL TELCOs	PUBLIC SCHOOLS, COLLEGES, REGIONAL EDUCATION CENTERS	25% DISCOUNT ON TRANSMISSION FACILITIES USED FOR DISTANCE LEARNING
UTAH PSC	NO	-	-
VERMONT PSB 11/	NO	-	-
VIRGINIA SCC	CENTEL-EXPERIMENTAL	SENIOR CITIZENS	10% OFF RESIDENTIAL RATES
WASHINGTON UTC	NO	-	-
WEST VIRGINIA PSC	NO	-	-
WISCONSIN PSC	NO	-	-
WYOMING PSC	YES	PUBLIC SCHOOL SYSTEM	REDUCED COIN PHONE RATE
CANADIAN RTC	NO	-	-

FOOTNOTES - TABLE 139

- 1/ A number of non-rate regulated telephone utilities offer service to some organizations at rates which may not be compensatory. Residential rather than business rates are applied in many cases.
- 2/ Commission does not allow charitable or concession rates as an above-the-line expense.
- 3/ The Commission discontinued preferential rates to religious and charitable organizations in 1976 rate case.
- 4/ Preferential rates discontinued. Case law holds that carriers may offer voluntary concessions but Commission may not order them to do so.
- 5/ Only one company offers this rate.
- 6/ Two major companies offer this service.
- 7/ This special service rate is for classroom computer access, not for office or faculty general use.
- 8/ Bell Atlantic Mobile (mostly unregulated) voluntarily offers free voice mail service to the residents of at least one homeless shelter.
- 9/ HB 3039, signed into law April 14, 1994, requires Southwestern Bell to provide 42% discount to public and private education institutions on use of SBC's analog interactive fiber optic video systems.
- 10/ Missouri statute 392.220(3) contemplates free or reduced service to certain groups including "ministers of religions"; however, no telecommunications company operating within Missouri has ever offered special rates for ministers or churches.
- 11/ Commission did not respond to request for update information; this data may not be current.

**TABLE 140 - STATE PARTICIPATION IN
LOW INCOME TELEPHONE ASSISTANCE PROGRAMS**

The following table indicates which states participate in one of two national programs, or their own state program, designed to assist low-income households in obtaining telephone service and further the goal of universal service in the United States. It was compiled in the Summer of 1988 and updated by the various state agencies in the process of updating the entire book. Column headings are explained in full in the Key given below.

KEY

- 1 **Link-Up America**, kicked off October 6, 1987, is sponsored by the FCC, Consumer Federation of America, USTA, and state regulators with the cooperation of many local groups. To qualify, an individual must not be claimed as a dependent for federal income tax purposes (unless over age 60); and must meet local income and eligibility requirements determined by each state. Each state submits its proposed plan to the FCC for certification. Under a Link-Up America plan, an individual may receive a waiver of 50% of a telephone company's normal installation charge, up to a maximum of \$30.00. In addition, telcos are encouraged to waive deposit requirements or allow deposits to be made in interest-free installments.
- 2 **The first Lifeline plan** approved and sponsored by the FCC in January 1985 provided a 50% reduction of the Subscriber Line Charge for eligible customers with the state offering a matching reduction. The second Lifeline Plan was approved one year later; it offered a waiver of up to 100% of the Subscriber Line Charge to eligible customers whose eligibility must be verifiable, with the state offering a matching reduction. Each state submits its proposed Lifeline plan to the FCC for certification.
- 3 **Own program** refers to any telephone assistance program developed by the state apart from or in addition to the FCC's Lifeline programs or Link-Up America.
- 4 **If one or the other of the assistance programs is not in place, is such a program being considered.**
- 5 **Would such an assistance program be prohibited by state law.**
- 6 **How is eligibility determined:** based on income level, for example a specified dollar amount income for a specified household size, or a percentage of a predetermined "poverty level"; or eligibility under an existing assistance program, such as AFDC, SSI, LIHEAP, public welfare, or other program; age, for example participant must be over 60 years of age; any other eligibility standards, such as single head of household.
- 7 **How are such programs funded:** by a special tax or surcharge on other customers; by offering the participating telcos a credit against certain state taxes; under existing tariffs; or other method of funding.

**TABLE 140 - STATE PARTICIPATION IN
LOW INCOME TELEPHONE ASSISTANCE PROGRAMS**

SEE KEY PREVIOUS PAGE AGENCY	1	2	3	4	5	6				7			
	LINK UP AMERICA	LIFE- LINE	OWN PROGRAM	UNDER CONSIDER- ATION	PRO- HIBITED BY LAW	ELIGIBILITY IS DETERMINED BY				SOURCE OF FUNDING IS VIA -			
						INCOME	EXISTING ASSIST.	AGE	OTHER	SUR- CHARGE	TAX CREDIT	TARIFF	OTHER
ALABAMA PSC	YES	NO	NO				YES						
ALASKA PUC	NO	NO	NO										
ARIZONA CC	YES	YES	YES-2		NO	YES-2	YES-1	YES-1	YES-1		YES-1		YES-2
ARKANSAS PSC	YES	YES	YES		NO		YES					YES	
CALIFORNIA PUC	NO	NO	YES		NO	YES			YES	YES			
COLORADO PUC	YES	YES	YES		NO		YES	YES		YES			
CONNECTICUT DPUC	YES	YES	NO		NO	YES	YES		YES				YES6/
DELAWARE PSC	YES	NO	NO	NO		YES	YES					YES	
DC PSC	YES	YES	YES		NO	YES	YES	YES					
FLORIDA PSC	YES	YES 7/	NO	NO	NO		YES		YES				4/
GEORGIA PSC	NO	NO	NO										
HAWAII PUC	YES	YES	YES		NO	YES		YES	Y 5/		YES		
IDaho PUC	YES	YES	NO		NO	YES	YES	YES	YES	YES			
ILLINOIS CC 3/	YES	NO	YES		NO		YES						YES
INDIANA URC	YES	NO	NO	NO	NO		YES	YES					
IOWA UB	YES	NO	NO		NO	YES	YES	YES				YES	
KANSAS SCC	YES	NO	YES		NO		YES					YES	
KENTUCKY PSC	YES	NO	NO	NO	NO	YES	YES					YES	
LOUISIANA PSC	YES	NO	NO				YES					YES	
MAINE PUC	YES	YES	NO		NO		YES						YES
MARYLAND PSC	YES	YES	YES		NO		YES				YES		
MASSACHUSETTS DPU	YES	YES	NO				YES			YES			
MICHIGAN PSC	YES	YES	NO		NO	YES						YES	
MINNESOTA PUC	YES	YES	YES		NO	YES	YES	YES	YES	YES			
MISSISSIPPI PSC	YES	YES	NO		NO	YES	YES	YES	YES				
MISSOURI PSC	YES	YES	NO		NO		YES						
MONTANA PSC	YES	YES	NO		NO		YES					YES	
NEBRASKA PSC	YES	NO	NO			YES	YES						
NEVADA PSC	YES	NO	YES	YES	NO	YES	YES	YES					BELL 1/
NEW HAMPSHIRE PUC	YES	NO	NO	NO	NO		YES						
NEW JERSEY BPU	YES	NO	NO	YES	NO		YES						
NEW MEXICO SCC	YES	YES	YES		NO		YES						
NEW YORK PSC	YES	YES	NO		NO	YES	YES						
NORTH CAROLINA UC	YES	YES	YES		NO		YES			YES		YES	
NORTH DAKOTA PSC	YES	YES	NO	NO	NO		YES						LEC YES2/
OHIO PUC	YES	YES	YES		NO		YES				YES		
OKLAHOMA CC	YES	YES	NO		NO		YES						
OREGON PUC	YES	YES	NO		NO	YES	YES			YES			
PENNSYLVANIA PUC	YES	NO	NO	NO	NO	YES	YES	YES		YES			
RHODE ISLAND PUC	YES	YES	NO	YES	NO		YES		YES	YES			
SOUTH CAROLINA	YES	YES	YES				YES						NECA
SOUTH DAKOTA PSC	YES	YES	NO		NO		YES	YES		YES		YES	
TENNESSEE PSC	YES	YES	NO			YES	YES	NO				YES	
TEXAS PUC	YES	YES	YES			YES	YES	YES	YES				Y 6/
UTAH PSC	YES	YES	NO		NO	YES	YES			YES			
VERMONT PSB	YES	YES	YES	YES	NO	YES	YES	YES		YES			
VIRGINIA SCC	YES	YES	YES		NO		YES					YES	YES
WASHINGTON UTC	YES	YES	YES		NO		YES			YES			
WEST VIRGINIA PSC	YES	YES	YES		NO	YES	YES	YES	YES		YES		
WISCONSIN PSC	YES	YES	YES		NO		YES					YES	
WYOMING PSC	YES	YES	YES		NO		YES			YES			

1/ Separations.

2/ Funded through rate base.

3/ Effective 3/1/93 (91-0262), CC reinstated the Link-Up America Program, now called Lifeline Connection Assistance. It also established the Universal Telephone Service Assistance Program (UTSAP), funded entirely by voluntary contributions.

4/ Effective 4/1/89, an expense adjustment in the amount of the discount will be added to the interstate carrier common line element. Likewise, local expenses in the intrastate jurisdiction will be reduced.

5/ Medical handicap.

6/ Assessment on intrastate service providers.

7/ Southern Bell is the only company offering the plan, began in 1994.